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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

**OMAR BOLANOS and CAREN
LUKE**, on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

**CROSSROADS EQUIPMENT
LEASE & FINANCE, LLC**,

Defendant.

Case No. 5:24-cv-00552-JGB-SP

Honorable Judge Jesus G. Bernal

**PLAINTIFFS' NOTICE OF
UNOPPOSED MOTION AND
MOTION FOR PRELIMINARY
APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: April 21, 2025

Time: 9:00 a.m. PST

Courtroom: Riverside, 1

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on April 21, 2025, at 9:00 a.m. PST, Plaintiffs Omar Bolanos and Caren Luke will move the Court for entry of an Order: (1) granting preliminary approval of the Settlement; (2) approving the Notice Program; (3) appointing Epiq as Settlement Administrator; (4) preliminarily certifying the Settlement Class for settlement purposes only; (5) appointing Omar Bolanos and Caren Luke as Class Representatives; (6) appointing Scott Edelsberg of Edelsberg Law, P.A., and Raina Borrelli of Strauss Borrelli PLLC as Settlement Class Counsel; (7) approving the form and content of the Short Form Notice (Ex. 1), Long Form Notice (Ex. 2), and Claim Form (Ex. 3), all attached to the Settlement, respectively; and (8) scheduling a Final Fairness Hearing to consider entry of a final order approving the Settlement, final certification of the Settlement Class for settlement purposes only, and the request for attorneys' fees, costs, and expenses, and Plaintiff's service award.

Dated: March 21, 2025

By: /s/ Raina C. Borrelli

Raina C. Borrelli (*pro hac vice*)

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7 *Proposed Settlement Class*
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CERTIFICATION OF COUNSEL

Pursuant to Local Rule 7-3, counsel for Plaintiffs certifies that they conferred with counsel for Defendant via email on March 10, 2025.

By: /s/ Raina C. Borrelli
Raina C. Borrelli

CERTIFICATE OF SERVICE

I, Raina C. Borrelli, hereby certify that on March 21, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel of record, below, via the ECF system.

DATED this 21st day of March, 2025.

STRAUSS BORRELLI PLLC

By: /s/ Raina C. Borrelli

Raina C. Borrelli

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